



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

GK/KCB/DEL/SMF  
F. #2018R01401

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 9, 2024

By ECF

The Honorable Diane Gujarati  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Cherwitz, et al.  
Criminal Docket No. 23-146 (DG)

Dear Judge Gujarati:

The government writes, pursuant to the Court's Individual Rule III.C, to respectfully request permission to file excess pages in its memorandum of law in support of its motions in limine in advance of trial, which is scheduled to commence on January 13, 2025. As the government previewed for the Court at the September 27, 2024 conference in this case, additional pages are required to sufficiently present the Court with arguments concerning the admission and preclusion of certain evidence and argument at trial in this multi-defendant case involving a forced labor conspiracy that spanned nearly a decade. As previously articulated, the government expects its case-in-chief to last multiple weeks given the complexity of the case as well as the volume of the evidence to be presented. The government's inclusive motions in limine will allow for the resolution of these issues before the commencement of trial and will ultimately result in the efficient presentation of evidence before the jury at trial.

As such, the government respectfully requests permission to file a memorandum of law in support of its motions in limine in excess of the Court's 25-page limit. This request is being made at least two (2) business days prior to the relevant memorandum's due date of October 11, 2024.

With the consent of the defendants, the government respectfully submits this letter motion requesting the Court's permission to file an over-length Motion in Limine for the reasons

set forth herein. The length of the proposed filing will not exceed 130 pages, excluding caption and signatures.

Respectfully submitted,

BREON PEACE  
United States Attorney

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